UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE: LOWER MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH) (ALL CASES)

NOTICE TO TAKE DEPOSITION UPON ORAL QUESTIONS

PLEASE TAKE NOTICE, that on May 4, 2013, at 10:00 o'clock A.M., at the office of Veritext, located at 1250 Broadway, Suite 2400, New York, New York 10001, attorneys for the plaintiffs herein will take the deposition of GARY FLAMMENBAUM, assistant general manager of Lefrak Organization, Inc. and Hudson Towers Housing Co. Inc., on oral examination before an officer duly authorized by law to administer oaths and the deposition will be recorded by videotape and stenographically in regard to the work at 400 Gateway Plaza. The deposition shall continue day to day until completed. The deposition shall be used for discovery purposes and may be introduced as evidence at the trial of the above-entitled action.

Dated: New York, New York March 27, 2013

Worby Groner Edelman & Napoli Bern, LLP Certain Plaintiffs' Counsel

By:

Christopher R. LoPalo (CL-6466)

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To: See Attached Service List

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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## **CERTIFICATE OF SERVICE**

I, Christopher R. LoPalo, an attorney duly licensed to practice before the Courts of the State of New York herby declares that I served a true copy of the within **NOTICE TO TAKE DEPOSITION UPON ORAL QUESTIONS** to all counsel on the Service List attached hereto. Service was effected by electronic mail.

This the 27<sup>th</sup> day of March 2013

Christopher R. LoPalo (CL-6466)

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